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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHAEL J. WELLS,

Plaintiff,

v.

CHRIS PILKERTON, in his official capacity
as the Administrator of the U.S. SMALL
BUSINESS ADMINISTRATION, *et al.*,

Defendants.

Case No. 3:19-cv-00407-MMD-CLB

**STIPULATION FOR EXTENSION OF
TIME TO ANSWER COMPLAINT**

First Request

COME NOW Plaintiff Michael J. Wells (“Plaintiff”) and Defendant Chris Pilkerton, in his capacity as Administrator of the United States Small Business Administration (“Defendant”), by and through their undersigned counsel, and hereby stipulate and agree that Defendant may have up to and including April 29, 2020 to answer Plaintiff’s complaint.

Defendant’s answer is currently due on March 30, 2020. Additional time is needed, however, because certain agency records related to the case are currently unavailable due to a person’s having tested positive to the coronavirus at the agency where the records are located. An extension would allow the agency an opportunity to retrieve those records for defense counsel’s review in drafting an answer. Plaintiff’s counsel has advised that he does not object to

1 this extension request. Accordingly, it is hereby proposed, and requested, that Defendant have
2 up to and including April 29, 2020 to answer the complaint.

3 This is Defendant's first request for an extension of time. This extension request is made
4 in good faith and not for the purpose of delay.

5 DATED: March 30th, 2020.

6 Respectfully submitted,

7 NICHOLAS A. TRUTANICH

ERICKSON, THORPE & SWAINSTON, LTD.

8 United States Attorney

9 /s/ Holly A. Vance

HOLLY A. VANCE

Assistant United States Attorney

Attorneys for Defendant

/s/ John C. Boyden

JOHN C. BOYDEN, Esq.

PAUL M. BERTONE, Esq.

Attorneys for Plaintiff

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13 **IT IS SO ORDERED:**

14 **Dated: March 31, 2020.**

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16 United States Magistrate Judge
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